REMARKS

In the Final Office Action mailed February 6, 2008, the Examiner objected

to claims 1-3, 5-8, and 14-21 as lacking antecedent basis; rejected claims 1, 9,

and 14 under 35 U.S.C. § 112, second paragraph, for omitting essential steps;

rejected claims 1-3 and 5-20 under 35 U.S.C. § 103(a) as unpatentable over

Schafer et al., DB-Prism: Integrated Warehouses and Knowledge Networks for

Bank Controlling," Proceeding of the 26th International Conference on Very Large

Databases, Cairo, Egypt, 2000 (hereinafter Schafer) in view of Lee et al., "A One-

Pass Aggregation Algorithm with the Optimal Buffer Size in Multi-Dimensional

LAP," Proceedings of the 28th VLDB Conference, Hong Kong, China, 2002

(hereinafter Lee) and further in view of U.S. Patent Application Publication

2004/0225675 to Benson; and rejected claim 21 under 35 U.S.C. § 103(a) as

unpatentable over Schafer, Lee, Benson, and U.S. Patent No. 6,851,107 to

Coud.

By this amendment, Applicants amend claims 1, 9, 14, and 21 to more

clearly define the features of those claims and cancel claims 3 and 12 to

incorporated the canceled subject matter into independent claims 1 and 9.

Claims 1, 2, 5-11, and 13-21 are currently pending.

Regarding the objection to claims 1-3, 5-8 and 14-21, the Examiner

submits that the specification does not disclose a computer-readable medium.

Applicants disagree and submit that the specification is replete with disclosure of

computer-readable medium. For example, at paragraph 0035 and 0036, the specification describes various examples including "program[s]," "database system," "database," and "read[ing] from the database." As such, the objection to claims 1-3, 5-8 and 14-21 should be withdrawn.

Regarding the rejection under 35 U.S.C. § 112, second paragraph, for omitting essential steps, the Applicants disagree because nowhere does the specification state that alleged omitted step is essential. See M.P.E.P 2172.01 ("A claim which omits matter disclosed to be essential to the invention as described in the specification or in other statements of record may be rejected under 35 U.S.C. 112, first paragraph, as not enabling. *In re Mayhew*, 527 F.2d 1229, 188 USPQ 356 (CCPA 1976).") Nonetheless, Applicants have amended claims 1, 9, and 14 to delete the phrase "corresponding to a database of the data object", obviating thus the basis for the Examiner's rejection under section 112.

Rejections of Claims 1-3 and 5-20 under 35 U.S.C. § 103

The Examiner rejected claims 1-3, and 5-20 as unpatentable over <u>Schafer</u> in view of <u>Lee</u> and <u>Benson</u>. Applicants respectfully traverses this rejection.

Claim 1, as amended, recites a combination including a database, wherein the database is a multidimensional database and a plurality of application tools, each of the tools being configured to access data objects from the database. Moreover, the tools include a business reporting tool which performs online analytical processing business reporting operations based on one or more data

objects accessed from a data buffer, the business reporting tool configured to view the one or more data objects and to not make changes to the one or more data objects, and a business planning tool, integrated with the reporting tool, which performs online analytical processing business planning operations based on the one or more data objects accessed from the data buffer, the business planning tool configured to view the one or more data objects and to change the one or more data objects. In addition, claim 1 includes the data buffer configured to store a copy of the one or more data objects accessed from the database and a delta buffer configured to store a delta record, wherein the delta record characterizes a difference between the one or more data objects and a modified version of the one or more data objects, the modified version being a result of a change made by the business planning tool to the data objects accessed from the database, the data objects buffered in the data buffer having a logical key, a description of an aggregation level, and a description of a selection condition, the business reporting tool. The business planning tool requests data from the data buffer having a specified aggregation level and a specified selection condition. The delta buffer and the data buffer provide an integrated view to the business reporting tool and the business planning tool.

In contrast to claim 1, Schafer discloses an integrated data warehouse for bank controlling. In particular, Schafer discloses a very specific type of application, "Matplan/b2brain," used as the "standard instrument for reporting and

analysis." Schafer, section 4. However, there is no disclosure in Schafer relating to the types of tools disclosed in the instant application and recited in claim 1. Specifically, "a business reporting tool which performs online analytical processing business reporting operations based on one or more data objects accessed from a data buffer, the business reporting tool configured to view the one or more data objects and to not make changes to the one or more data objects, and a business planning tool, integrated with the reporting tool, which performs online analytical processing business planning operations based on the one or more data objects accessed from the data buffer, the business planning tool configured to view the one or more data objects and to change the one or more data objects." Moreover, there is no disclosure in Schafer of a "delta buffer," much less that the "delta buffer and the data buffer providing an integrated view to the business reporting tool and the business planning tool."

The Examiner appears to acknowledge that Schafer lacks the "data buffer" features as recited in claim 1. To attempt a cure of this shortfall, the Examiner relies on Lee. However, Lee discloses algorithms specifically designed to function with a Multilevel Grid File (MLGF), which is unlikely to be operable and combinable with Schafer. Lee, page 2, left col. para. 4. Moreover, Applicants have reviewed Lee section 2.1, which was relied upon by the Examiner, and that section does not disclose the "data buffer" as alleged by the Examiner. Instead,

Lee section 2.1 discloses partitioning regions and other splitting strategies. As such, Lee fails to cure the above-noted deficiencies of Schafer.

Acknowledging that Schafer and Lee lack any disclosure related to a "delta buffer," the Examiner further relies on Benson to allegedly cure the gaps in the Schafer and Lee disclosures. Office Action, page 7. In particular, the Examiner alleges that Benson at paragraphs 0040 and 0053 discloses the "delta buffer," as recited in claim. However, Benson's entity 284 does not correspond to data objects or to a delta buffer. Instead, it appears to correspond to status information, such as "missing," "new," "updated," and "unchanged." Indeed, this status information cannot be aggregated or for that matter be the subject of a delta determination. As such, Lee fails to cure the above-noted deficiencies of Schafer and Benson.

In view of the foregoing, neither Schafer, Lee, nor Benson, whether taken alone or in combination, fails to disclose at least the following features as recited in claim 1: "a business reporting tool," "a business planning tool," and a "delta buffer." As such, claim 1 is allowable over Schafer, Lee, and Benson, and the rejection of claim 1 under 35 U.S.C. § 103(a) should be withdrawn.

Regarding the motivation to combine, Applicants submit that the motivation given by the Examiner, namely using an aggregation method that uses dynamic multidimensional files adapted to skewed distributions and varying page regions, has nothing to do with Schafer or Lee, much less claim 1. Office

Action, pages 6-7. As such, Applicants submit that the motivation alleged by the Examiner would not lead a skilled artisan to combine and modify the references in the manner proposed by the Examiner.

Claims 2 and 5-8 depend from claim 1. Claims 9-14, although of different scope, include limitations that are similar to those noted above with respect to claim 1. Claims 10, 11, and 13 depend from claim 9. Claims 15-20 depend from claim 14. For at least the reasons given above with respect to claim 1, claims 2, 5-11, and 13-20 are allowable over Schafer, Lee, and Benson, and the rejection of those claims under 35 U.S.C. § 103(a) should be withdrawn.

Rejections of Claim 21 under 35 U.S.C. § 103

The Examiner rejected claim 21 under 35 U.S.C. § 103(a) as unpatentable over Schafer, Lee, Benson, and U.S. Patent No. 6,851,107 to Coud.

Claim 21, although of different scope, includes recitations that are similar to those noted above with respect to claim 1. For at least the reasons noted above, claim 21 is allowable over Schafer, Lee, and Benson. Regarding Coud, it discloses a software development tool "with a graphical and textual display of source code." Coud, col. 2, lines 48. However, that disclosure in Coud does not constitute a "business planning tool, visually integrated with the reporting tool" as recited in claim 1. Moreover, Coud fails to cure any of the above-noted deficiencies in Schafer, Lee, and Benson. For at least this reason, claims 21 is

allowable over <u>Schafer</u>, <u>Lee</u>, <u>Benson</u>, and <u>Coud</u>. Therefore, the rejection of

claim 21 under 35 U.S.C. § 103(a) should be withdrawn.

Concluding Comments

Applicants respectfully request that this Amendment under 37 C.F.R.

§ 1.116 be entered by the Examiner. Applicants submit that the proposed

amendments do not raise new issues or necessitate the undertaking of any

additional search of the art by the Examiner. Therefore, this Amendment should

allow for immediate action by the Examiner. Finally, Applicants submit that the

entry of the amendment would place the application in better form for appeal,

should the Examiner continue to dispute the patentability of the pending claims.
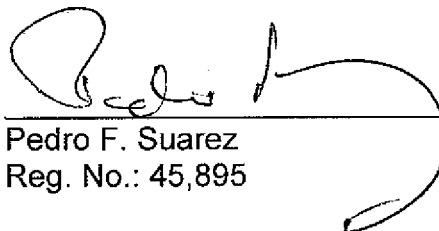
It is believed that all of the pending claims have been addressed in this

paper. However, failure to address a specific rejection, issue or comment, does

not signify agreement with or concession of that rejection, issue or comment. In

addition, because the arguments made above are not intended to be exhaustive,

there may be reasons for patentability of any or all pending claims (or other

claims) that have not been expressed. Finally, nothing in this paper should be

construed as an intent to concede any issue with regard to any claim, except as

specifically stated in this paper, and the amendment of any claim does not

necessarily signify concession of unpatentability of the claim prior to its

amendment.

On the basis of the foregoing amendments, Applicants respectfully submit that the pending claims are in condition for allowance. If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below.

The Commissioner is hereby authorized to charge any additional fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311, Reference No. 34874-022.

Respectfully submitted,

Date: April 14, 2008

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